From: Ferreira, Steve
To: "Schindler, Jason"
Cc: Ferreira, Gina

Subject: RE: Hatco pond sampling plan

Date: Wednesday, April 01, 2020 6:28:00 AM

Hi Jason:

Steve

Below please find a consolidated EPA/NJDEP letter concerning the response to EPA & NJDEP's previous comments. Any questions, please let me know,

Weston Response to USEPA General Comment 1. The original fill material used to reconstruct the wetland area was certified clean fill material (topsoil), not sediment placed in accordance with applicable NJDEP regulation and guidance (e.g., NJDEP Fill Material Guidance for SRP Sites), as well as in accordance with the NJDEP-approved wetland disruption permit for this area. The certified clean fill material utilized in this area was compared to site-specific remediation standards including, as applicable, NJDEP Soil Remediation Standards and Default Impact to Groundwater Soil Screening Levels. Additionally, the method detection limits for the conventional analytical methods used to document the clean fill are higher than the ecological screening criteria (ESC). Therefore, the original data cannot be compared to the ESC. Because the intent of the first phase of the proposed plan is to evaluate whether the clean fill previously placed in this area has been adversely affected, Weston intends to use the same analytical methods, as applicable, and compare the results to the same criteria as the original clean fill data. If the analytical results indicate that the clean fill has been affected by the recent release, then further sampling will be recommended as warranted to address all applicable receptors. The surface water sample results will be compared with applicable Surface Water Quality Standards (NJAC 7:9B) for FW2.

March 2020 USEPA RTC – The pond bottom media is considered sediment at this point. NJDEP's definition of sediment states that "... all unconsolidated material below a water body" is considered sediment for remedial investigations and actions. Please provide the ESC values referenced in this response in the report tables for comparison of collected soil, surface water, and sediment samples. Weston can proceed with comparing the clean fill to the same criteria as previously used (NJDEP SRS and DIGWSSL) but should also compare the soil, surface water, and sediment samples to appropriate ESC values for the protection of wildlife as well

Weston Response to USEPA General Comment 2. The attached drawing shows the location of the AOCs. This has been added to the plan as figure 2. *The response is acknowledged and accepted by USEPA*.

Weston Response to USEPA General Comment 3. Figure 1 has been updated to show the limits of clean fill. The pathway from the recent release was clearly visible at the time of the release and mapped on the drawing. As noted during the site visit on February 18, 2020, this pathway remains visible today. The response is acknowledged and accepted by USEPA.

Weston Response to USEPA General Comment 4. Weston has added samples to Phase 1 in the FSP. This includes the pond bottom samples and surface water samples biased to the locations noted in NJDEP's comment 2 below. The additional Phase 1 samples consist of a surface water sample at the northern section of the pond and four additional solid from accessible pond bottom material below the water line near the four pond bottom locations already proposed above the water line. The need for additional sampling, if any, will be based on the results of the initial sampling and collected during Phase 2.

March 2020 USEPA RTC - USEPA and NJDEP recommended that additional sediment

(pond bottom) and surface water samples be added in the northern portion of the Southeast Leg Wetland Pond; it does not seem like this was done. USEPA recommends either adding two additional co-located sediment and surface water samples in the northern interior portion of the pond (~ parallel to SEL-PA-SB04 and SEL-PA-SB27) or moving samples SEL-PA-Bottom 02 and SEL-PA-Bottom 04 to the northern interior of the pond; these should be co-located sediment and surface water samples.

Weston Response to USEPA Specific Comment 1. The contaminated soil consists of soil containing less than 500 mg/kg PCBs that was excavated and consolidated beneath the engineered cap as part of the Southeast Leg remediation project in accordance with the approved work plan. The concern regarding this investigation deals with (1) any impacts from the release from the facility standpipe in this area and (2) any impacts from the cap installed on top of the contaminated soil previously consolidated in this area as part of the EPA/NJDEP-approved remedial actions for this area of the Site. The soil is not discolored and does not have a sheen. The response is acknowledged and accepted by USEPA.

Weston Response to NJDEP Comment 1. The SEL Wetland Pond area is a man-made pond/wetlands that was re-constructed in accordance with a NJDEP-approved wetland disruption permit as part of the remedial actions for this area of the Site. The pond is approximately one third of an acre in size (see figure 2 for the location and size of the area). The water level in the pond is consistent with the water table in this area. No fish or other wildlife were stocked in the pond following construction. There is one outlet from the pond which consists of a concrete pipe that discharges to the wetland area associated with Channel A to the west.

All visible sheen was observed and removed during the initial response action. This sheen was removed using sorbent wipes and boom as noted in the summary report provided to USEPA on July 10, 2018. No sheen remains. The leak in the sewer that was the source of the release has been repaired. Figure 2 has been added to show the relative locations of the AOCs.

<u>March 2020 NJDEP RTC</u> – The response is acceptable. Please note that, notwithstanding the pond was not stocked with fish or wildlife, natural replenishment is expected.

Weston Response to NJDEP Comment 2.

The source of the release was identified as the joint between an underground sewer pipe and riser pipe. The sampling program focusses along the observed pathway and edge of water where the evidence of release was observed. These are the areas of clean fill that are most likely to have been impacted. A heavy sheen was observed floating on the water in the pond at these locations and have been identified as the most likely areas for contamination to have occurred (i.e., sampling is biased to suspected worst-case locations). However, in response to this comment, we have added four pond bottom samples, to be collected below the water line, near each of the planned soil sample locations. We have also added a surface water sample from the northern portion of the pond. Both the northern pond bottom and northern surface water sample locations are biased to the area of the release pathway influent at the northern portion of the pond. If one or more of the pond bottom samples collected during Phase 1 indicates the presence of contamination, then the Phase 2 sampling will be modified to include additional pond bottom samples. The subsequent sampling will depend on both the Phase 1 and Phase 2 data and will include a minimum of two sample depths. Phase 1 and Phase 2 sample locations will be collected at the 0 to 0.5-foot interval only. TOC analysis has been added for the soil and pond bottom samples. The initial surface water samples will be analyzed for total metals. If results indicate the need for further evaluation, then dissolved metals will be added for subsequent sample analysis during Phase 2 or Phase 3.

<u>March 2020 NJDEP RTC</u> - The "Pond Bottom" (sediment) sample locations proposed in the revised March 2020 FSP are not adequate for Phase I sampling. NJDEP concurs with "USEPA RTC, General Comment 4" that a minimum of three (3) three sediment and co-

located surface water samples should be collected in the northern/influent portion of the pond.

Weston Response to NJDEP Comment 3.

Weston's intent is to initially compare the data with sample results for the clean fill used to reconstruct the area. If the results are consistent with the clean fill results, indicating no impacts, then no further action will be recommended. If evidence of impacts is identified, then Weston will evaluate and restore the wetlands in accordance with applicable guidance.

March 2020 NJDEP RTC - NJDEP does not agree with the approached proposed for data evaluation. The certified clean fill material used to restore the wetlands (or any ecological exposure areas) should have met NJDEP's ecological screening criteria (ESC). NJDEP concurs with "USEPA RTC, General Comment 1." In addition to comparing new data with previous "clean fill" data, NJDEP SRS and DIGWSSL, new "pond bottom" sediment data must be compared with sediment ESC. (As an example of concern, Residential SRS for copper is approximately 100X the sediment ESC). Laboratory analytical method detection limits must meet the ESC. Weston should plan to consult with NJDEP and USEPA on the Phase 1 results

Weston Response to NJDEP Comment 4.

The LSRP has been added to the contact list. *The response is acceptable*.

From: Schindler, Jason < Jason. Schindler@Weston Solutions.com>

Sent: Friday, March 13, 2020 1:12 PM

To: Nancy Hamill < Nancy. Hamill@dep.nj.gov>

Cc: Ferreira, Steve <Ferreira.Steve@epa.gov>; Mark D. Fisher (mfisher@elminc.com)

<mfisher@elminc.com>

Subject: FW: Hatco pond sampling plan

Hi Nancy,

I inadvertently left you off of the distribution list for the response message below. Feel free to contact Mark or myself with any questions.

Thanks, Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive Edison, NJ 08837

Tel: 732-417-5804 Cell: 732-740-5529 Fax: 732-417-5801

www.westonsolutions.com

From: Schindler, Jason

Sent: Friday, March 13, 2020 12:47 PM

To: Ferreira, Steve < Ferreira. Steve@epa.gov >

Cc: Mark D. Fisher (<u>mfisher@elminc.com</u>) < <u>mfisher@elminc.com</u>>; Ansari, Ramin

<Ramin.Ansari@lanxess.com>; Venkat Puranapanda (Venkat.puranapanda@chubb.com)

<Venkat.puranapanda@chubb.com>; Devorak, Coleen (Coleen.Devorak@WestonSolutions.com)

<<u>Coleen.Devorak@WestonSolutions.com</u>>; Peachey, Bryan

<Bryan.Peachey@WestonSolutions.com>; Sontag, John <<u>John.Sontag@WestonSolutions.com</u>>;

Kirby, Lisa < Lisa. Daniel@lanxess.com >; Ostapczuk, Eric < Eric. Ostapczuk@tetratech.com >

Subject: RE: Hatco pond sampling plan

Hi Steve,

Following are our responses to USEPA and NJDEP comments on the draft field sampling plan. Agency comments are reproduced below with our direct responses. I have also attached a complete copy of the revised plan incorporating the changes described. Feel free to contact me if you have any questions or concerns.

Thanks,
Jason
Jason Schindler
Principal Project Manager
Weston Solutions, Inc.
205 Campus Drive
Edison, NJ 08837
Tel: 732-417-5804

Tel: 732-417-5804 Cell: 732-740-5529 Fax: 732-417-5801

www.westonsolutions.com

USEPA General Comment 1. Since the area of concern is a reconstructed wetland, the primary intent of the program should be to delineate the extent of soil, **sediment**, and surface water contamination. As a result of this, soil, sediment, and surface water sample results should be compared to ecological screening criteria to identify contaminants of concern not the human-health based criteria presented in Table 1.

Response to USEPA General Comment 1. The original fill material used to reconstruct the wetland area was certified clean fill material (topsoil), not sediment placed in accordance with applicable NJDEP regulation and guidance (e.g., NJDEP Fill Material Guidance for SRP Sites), as well as in accordance with the NJDEP-approved wetland disruption permit for this area. The certified clean fill material utilized in this area was compared to site-specific remediation standards including, as applicable, NJDEP Soil Remediation Standards and Default Impact to Groundwater Soil Screening Levels. Additionally, the method detection limits for the conventional analytical methods used to document the clean fill are higher than the ecological screening criteria (ESC). Therefore, the original data cannot be compared to the ESC. Because the intent of the first phase of the proposed plan is to evaluate whether the clean fill previously placed in this area has been adversely affected, Weston intends to use the same analytical methods, as applicable, and compare the results to the same criteria as the original clean fill data. If the analytical results indicate that the clean fill has been affected by the recent release, then further sampling will be recommended as warranted to address all applicable receptors. The surface water sample results will be compared with applicable Surface Water Quality Standards (NJAC 7:9B) for FW2.

USEPA General Comment 2. A figure needs to be included illustrating the relationship of this pond area to the other AOCs at the site and the site as a whole.

Response to USEPA General Comment 2. The attached drawing shows the location of the AOCs. This has been added to the plan as figure 2.

USEPA General Comment 3. Figure 1 needs to include additional information such as the limits of clean fill around the pond and the area of reconstructed wetlands. Information needs to be added to the text indicating why the preferential pathway was chosen from the release source area to the open water in the pond. Is there a ditch or submerged area that would direct all water only through this path compared to entering the wetland in a radial direction from the release area?

Response to USEPA General Comment 3. Figure 1 has been updated to show the limits of clean fill. The pathway from the recent release was clearly visible at the time of the release and mapped on the drawing. As noted during the site visit on February 18, 2020, this pathway

remains visible today.

USEPA General Comment 4. Additional samples need to be added to this plan including sediment samples throughout the pond and surface water samples toward the northern section of the pond. These samples can be proposed in a phased approach as well with an emphasis on the northern sections of the pond.

Response to USEPA General Comment 4. Weston has added samples to Phase 1 in the FSP. This includes the pond bottom samples and surface water samples biased to the locations noted in NJDEP's comment 2 below. The additional Phase 1 samples consist of a surface water sample at the northern section of the pond and four additional solid from accessible pond bottom material below the water line near the four pond bottom locations already proposed above the water line. The need for additional sampling, if any, will be based on the results of the initial sampling and collected during Phase 2.

<u>USEPA Specific Comment 1.</u> Page 1, 3rd paragraph, 2nd and 3rd sentences — These sentences mention "contaminated soil" but do not indicate how this designation was determined. Was the soil discolored, did it have a sheen, was sampling performed, etc? Please provide additional information indicating why the soil was considered contaminated.

Response to USEPA Specific Comment 1. The contaminated soil consists of soil containing less than 500 mg/kg PCBs that was excavated and consolidated beneath the engineered cap as part of the Southeast Leg remediation project in accordance with the approved work plan. The concern regarding this investigation deals with (1) any impacts from the release from the facility standpipe in this area and (2) any impacts from the erosion of the cap installed on top of the contaminated soil previously consolidated in this area as part of the EPA/NJDEP-approved remedial actions for this area of the Site. The soil is not discolored and does not have a sheen.

NJDEP Comment 1. (p. 1) 1. *Problem Definition* — Please provide a summary of the physical/habitat characteristics of the SEL Wetland Pond Area, such as size/areal extent, hydrogeology (pond bottom elevation range, water depth), fish/wildlife presence/use, etc. Is there an outlet from the pond? Please provide a figure showing its location relative to AOC 24 Woodbridge Pond and other labelled site AOCs above Riverside Dr. This section states that "heavy sheen" was recovered by Weston — does any sheen remain? Has the leak in the sewer been repaired/discharge stopped?

Response to NJDEP Comment 1. The SEL Wetland Pond area is a man-made pond/wetlands that was re-constructed in accordance with a NJDEP-approved wetland disruption permit as part of the remedial actions for this area of the Site. The pond is approximately one third of an acre in size (see figure 2 for the location and size of the area). The water level in the pond is consistent with the water table in this area. No fish or other wildlife were stocked in the pond following construction. There is one outlet from the pond which consists of a concrete pipe that discharges to the wetland area associated with Channel A to the west.

All visible sheen was observed and removed during the initial response action. This sheen was removed using sorbent wipes and boom as noted in the summary report provided to USEPA on July 10, 2018. No sheen remains. The leak in the sewer that was the source of the release has been repaired. Figure 2 has been added to show the relative locations of the AOCs.

NJDEP Comment 2. (p. 2) 3. <u>Sample Design, Rationale, Locations</u> – three (3) phases of sampling are proposed and limited to the stormwater sewer release pathway and perimeter wetland soils surrounding Southeast Leg (SEL) Wetland Pond at the approximate waterline. It is unclear how this approach will meet the objective to determine the "contaminants which have impacted the clean fill used to construct the SEL Wetland Pond in 2015." In addition to proposed locations, Phase 1 sampling should include biased pond sediment and co-located surface water samples at the release pathway influent location (at north end of pond), covering an appropriate portion of the pond (e.g., the northern half). The design of subsequent sampling

phases (e.g., gridding) should depend on Phase 1 data. In accordance with NJDEP's *Ecological Evaluation Technical Guidance*, August 2018, a minimum of 2 sample depths at each soil/sediment location should be collected (0-0.5' and at least one other subsurface interval). TOC analyses are recommended at each sediment location, and total and dissolved metals should be analyzed at each surface water location.

Response to NJDEP Comment 2.

The source of the release was identified as the joint between an underground sewer pipe and riser pipe. The sampling program focusses along the observed pathway and edge of water where the evidence of release was observed. These are the areas of clean fill that are most likely to have been impacted. A heavy sheen was observed floating on the water in the pond at these locations and have been identified as the most likely areas for contamination to have occurred (i.e., sampling is biased to suspected worst-case locations). However, in response to this comment, we have added four pond bottom samples, to be collected below the water line, near each of the planned soil sample locations. We have also added a surface water sample from the northern portion of the pond. Both the northern pond bottom and northern surface water sample locations are biased to the area of the release pathway influent at the northern portion of the pond. If one or more of the pond bottom samples collected during Phase 1 indicates the presence of contamination then the Phase 2 sampling will be modified to include additional pond bottom samples. The subsequent sampling will depend on both the Phase 1 and Phase 2 data and will include a minimum of two sample depths. Phase 1 and Phase 2 sample locations will be collected at the 0 to 0.5-foot interval only. TOC analysis has been added for the soil and pond bottom samples. The initial surface water samples will be analyzed for total metals. If results indicate the need for further evaluation then dissolved metals will be added for subsequent sample analysis during Phase 2 or Phase 3.

NJDEP Comment 3. (p.2) Sections 3.1 and 3.2 state that the NJDEP Residential and Non-Residential Direct Contact Soil Cleanup Criteria will be used for data comparison and contaminant delineation. As a reconstructed wetland and apparent open water area, the SEL Wetland Pond Area is an environmentally sensitive natural resource (ESNR) and comparison of data with ecological sediment/soil screening criteria is paramount. Please refer to https://www.nj.gov/dep/srp/guidance/ecoscreening/. Similar to the data evaluation approach used for Woodbridge Pond, the EPA-directed sediment delineation/remediation criteria for total PCBs of 1 mg/kg and for BEHP of 22 mg/kg (Washington State freshwater sediment standard) should be used for the SEL Wetland Pond sediments.

Response to NJDEP Comment 3.

Weston's intent is to initially compare the data with sample results for the clean fill used to reconstruct the area. If the results are consistent with the clean fill results, indicating no impacts, then no further action will be recommended. If evidence of impacts is identified, then Weston will evaluate and restore the wetlands in accordance with applicable guidance.

NJDEP Comment 4. (p. 3) 4. *Key Project Personnel and Contact Information* – Please add the LSRP of record to this this list.

Response to NJDEP Comment 4.

The LSRP has been added to the contact list.

From: Ferreira, Steve [mailto:Ferreira.Steve@epa.gov]

Sent: Tuesday, February 11, 2020 6:24 AM

To: Schindler, Jason < <u>Jason.Schindler@WestonSolutions.com</u>>

Subject: RE: Hatco pond sampling plan

** External Email **

Hi Jason:

Here are our comments. Please note that our risk assessor coordinated with the NJDEP's eco risk assessor on this project, and additional comments from NJDEP have been included.

Any questions, please let me know.

Steve

General Comments

Since the area of concern is a reconstructed wetland, the primary intent of the program should be to delineate the extent of soil, **sediment**, and surface water contamination. As a result of this, soil, sediment, and surface water sample results should be compared to ecological screening criteria to identify contaminants of concern not the human-health based criteria presented in Table 1.

A figure needs to be included illustrating the relationship of this pond area to the other AOCs at the site and the site as a whole.

Figure 1 needs to include additional information such as the limits of clean fill around the pond and the area of reconstructed wetlands. Information needs to be added to the text indicating why the preferential pathway was chosen from the release source area to the open water in the pond. Is there a ditch or submerged area that would direct all water only through this path compared to entering the wetland in a radial direction from the release area? Additional samples need to be added to this plan including sediment samples throughout the pond and surface water samples toward the northern section of the pond. These samples can be

Specific Comments

Page 1, 3rd paragraph, 2nd and 3rd sentences – These sentences mention "contaminated soil" but do not indicate how this designation was determined. Was the soil discolored, did it have a sheen, was sampling performed, etc? Please provide additional information indicating why the soil was considered contaminated.

proposed in a phased approach as well with an emphasis on the northern sections of the pond.

NJDEP Comments

- 1. (p. 1) 1. <u>Problem Definition</u> Please provide a summary of the physical/habitat characteristics of the SEL Wetland Pond Area, such as size/areal extent, hydrogeology (pond bottom elevation range, water depth), fish/wildlife presence/use, etc. Is there an outlet from the pond? Please provide a figure showing its location relative to AOC 24 Woodbridge Pond and other labelled site AOCs above Riverside Dr. This section states that "heavy sheen" was recovered by Weston does any sheen remain? Has the leak in the sewer been repaired/discharge stopped?
- 2. (p. 2) 3. Sample Design, Rationale, Locations three (3) phases of sampling are proposed and limited to the stormwater sewer release pathway and perimeter wetland soils surrounding Southeast Leg (SEL) Wetland Pond at the approximate waterline. It is unclear how this approach will meet the objective to determine the "contaminants which have impacted the clean fill used to construct the SEL Wetland Pond in 2015." In addition to proposed locations, Phase 1 sampling should include biased pond sediment and co-located surface water samples at the release pathway influent location (at north end of pond), covering an appropriate portion of the pond (e.g., the northern half). The design of subsequent sampling phases (e.g., gridding) should depend on Phase 1 data. In accordance with NJDEP's Ecological Evaluation Technical Guidance, August 2018, a minimum of 2 sample depths at each soil/sediment location should be collected (0-0.5' and at least one other subsurface interval). TOC analyses are recommended at each sediment location, and total and dissolved metals

should be analyzed at each surface water location.

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https://www.nj.gov/dep/srp/guidance/ecoscreening/. Similar to the data evaluation approach used for Woodbridge Pond, the EPA-directed sediment delineation/remediation criteria for total PCBs of 1 mg/kg and for BEHP of 22 mg/kg (Washington State freshwater sediment standard) should be used for the SEL Wetland Pond sediments.

4. (p. 3) 4. Key Project Personnel and Contact Information – Please add the LSRP of record to this this list.

From: Schindler, Jason < <u>Jason.Schindler@WestonSolutions.com</u>>

Sent: Thursday, January 30, 2020 3:41 PM **To:** Ferreira, Steve < Ferreira. Steve@epa.gov>

Cc: Mark D. Fisher (<u>mfisher@elminc.com</u>) <<u>mfisher@elminc.com</u>>; Ansari, Ramin

<Ramin.Ansari@lanxess.com>; Venkat Puranapanda (Venkat.puranapanda@chubb.com)

<<u>Venkat.puranapanda@chubb.com</u>>; Devorak, Coleen <<u>coleen.devorak@westonsolutions.com</u>>;

Sontag, John < John.Sontag@WestonSolutions.com>; Peachey, Bryan

<Bryan.Peachey@WestonSolutions.com>

Subject: Hatco pond sampling plan

Hi Steve,

Attached please find Weston's sampling plan for the Southeast Leg wetland pond area at the Hatco site. Please let me know how much time you anticipate for your review.

Thanks,

Jason

Jason Schindler

Principal Project Manager

Weston Solutions, Inc.

205 Campus Drive

Edison, NJ 08837 Tel: 732-417-5804 Cell: 732-740-5529

Fax: 732-417-5801

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written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.



Southeast Leg Wetland Pond Area Field Sampling Plan and Quality Assurance Project Plan Addendum Hatco Site – Fords, New Jersey January 2020

1. Problem Definition

Weston Solutions, Inc. (Weston®) has prepared this Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP) Addendum to describe investigation activities in the portion of the Hatco Remediation Site designated as AOC-2 Former Ponds Area, Southeast Leg (SEL) Wetland Pond Area. This document is intended as an addendum to the project QAPP originally prepared as part of Weston's 2009 Addendum 3 to the Consolidated Remedial Action Work Plan (RAWP), and provides specific sample collection methodology and laboratory analyses requirements.

The primary intent of this program is to delineate the extent of soil and/or surface water contamination in the recently reconstructed wetlands in the SEL Remediation Area. Remediation in the SEL Wetland Pond Area was performed in 2015, and included excavation and offsite disposal of light non-aqueous phase liquid (LNAPL) and soil containing polychlorinated biphenyls (PCBs) and bis(2-ethylhexyl) phthalate (BEHP). Post-remediation soil samples confirmed removal of PCBs above the remediation goal of 2 mg/kg and BEHP above the remediation goal of 210 mg/kg, to the limits of the excavation. The SEL Wetland Pond Area was then backfilled with imported clean fill. The area was restored as a wetland in accordance with the approved wetland disruption permit for this area.

On June 19, 2018, Weston personnel conducting remediation activities in the AOC-2 Former Ponds Area of the Hatco Site discovered that a hole had formed in the ground adjacent to a facility standpipe. The standpipe was connected to a stormwater sewer line which ran through an area of contaminated soil. The contaminated soil was placed as part of the Southeast Leg (SEL) remediation project and consolidated beneath an engineered cap. The area acted as a pathway for contaminated soil to be transported to the ground surface and into the reconstructed wetlands. Sheen was observed on portions of the northern and southern edges of the SEL Wetland Pond Area. The majority of the sheen was observed across an approximately 800 square-foot area within roughly ten feet of the southern edge of the pond. The heavy sheen was recovered by Weston personnel using sorbent materials.

Weston plans to implement a multiple-phase sampling approach to:

- 1. Identify contaminants present at concentrations above applicable remediation criteria;
- 2. Determine the extent of soil contamination; and
- 3. Delineate the impacts that require remediation.

Results of this sampling program will be used to define the horizontal and vertical limits of possible contaminated soil to be removed from this area.

2. Project Data Quality Objectives

The following data quality objectives have been established for this work:

• Sensitivity Data Quality Objectives (DQO): Reporting limits will be below the site-specific criteria summarized in *Table 1: Site-Specific Direct Contact Soil Remediation Criteria*.



• Accuracy, precision, representativeness, completeness and comparability goals will be as stated in Weston's 2009 Addendum 3 to the Consolidated RAWP.

Weston will communicate project-specific DQO to the analytical laboratory.

3. Sample Design, Rationale and Locations

Soil samples will be collected to define the extent of soil contamination at the SEL Wetland Pond Area. Sampling will be performed in three phases to: 1) identify contaminants associated with the sewer release; 2) identify contaminants which have impacted the clean fill used to construct the SEL Wetlands in 2015; and 3) delineate the extent of impacts which require remediation. One surface water sample will be collected to evaluate the effect of the contaminants upon surface water quality. Each sampling location will be photographed and documented with a field sketch. If a location is inaccessible then the final location may be adjusted based on field conditions. *Figure 1: Southeast Leg Pond Area Sewer Line Release Sampling* is an overall site map showing the location of the soil and surface water samples. No permitting will be required for sampling.

3.1 Phase 1: Identify Contaminants

Phase 1 will consist of identifying contaminants associated with the sewer release. Weston will collect six surface soil samples and one surface water sample for laboratory analysis as described on *Table 3: Sample Summary*, using a standard laboratory turnaround time. Sample results will be compared to site specific criteria. Applicable criteria for the Hatco Site are defined in the RAWP and United States Environmental Protection Agency (USEPA) Risk-Based PCB Disposal Approval. Direct contact soil criteria are the New Jersey Department of Environmental Protection (NJDEP) soil cleanup criteria subject to the NJDEP Order of Magnitude Guidance, updated August 10, 2009. Applicable criteria are summarized on *Table 1*.

Two soil samples will be collected along the apparent pathway from the original release leading to the pond; four soil samples will be collected from the north, east, south and west perimeter of the pond at the approximate water line; and one surface water sample will be collected from the south end of the pond where a visible sheen was previously identified. Soil samples will be collected from the 0- to 6-inch depth interval. Planned sample locations are shown on *Figure 1*. These locations are subject to adjustment based on field observations.

3.2 Phase 2: Determine Extent of Soil Contamination

Phase 2 will consist of determining the impact of contaminants identified in the Phase 1 sampling upon the clean fill used to construct the SEL Wetlands in 2015. If any contaminants are identified above a standard by Phase 1 sampling, Weston will implement Phase 2. Weston will collect soil samples at 15-foot intervals along the apparent pathway from the original release to the pond and around the perimeter of the pond at the approximate water line. Samples will be analyzed for the potential contaminants identified in Phase 1. Sample results will be compared to the remediation criteria for the site summarized on *Table 1*.

Contaminants detected in the SEL Wetland Pond Area at concentrations greater than the Non-Residential Direct Contact Soil Cleanup Criteria (NRDCSCC) are subject to remediation by removal. Contaminants detected at concentrations less than the NRDCSCC but greater than the Residential Direct Contact Soil Cleanup Criteria (RDCSCC) will be managed through a deed notice to be established for the entire site.



3.3 Phase 3: Determine the Extent of Impacts Which Require Remediation

Phase 3 will consist of determining the extent of impacts which require remediation. Horizontal step-out samples will be collected at approximately 5-foot intervals, as necessary, to delineate contamination at locations identified during Phase 2 sampling.

4. Key Project Personnel and Contact Information

Name	Title	Cell Phone	Email
Jason Schindler	Principal Project Manager	(732) 740-5529	Jason.schindler@westonsolutions.com
Coleen Devorak	Senior Project Leader	(732) 476-7479	Coleen.devorak@westonsolutions.com
Aaron Roppoli	Associate Geoscientist/Site Safety Officer	(251) 751-2882	Aaron.Roppoli@WestonSolutions.com
Habib Bravo-Ruiz	Associate Geoscientist	(787) 360-4156	Habib.Bravo-Ruiz@WestonSolutions.com
Eliel Lucero	Project Scientist	(908) 229-3614	Eliel.Lucero@WestonSolutions.com
Larry Werts	Health and Safety Coordinator	(215) 815-6237	<u>Lawrence.Werts@WestonSolutions.com</u>
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5. Sampling Methodology

The sampling procedures will follow the guidelines documented in the *NJDEP Field Sampling Procedures Manual* (August 2005) as described below, and are detailed in Weston's 2009 QAPP. Lithologic descriptions and field observations will be recorded in the field logbook. Soil samples will be collected from discrete 6-inch intervals from designated depths, as outlined in *Table 1*.

5.1 Soil Sampling

The sampling team will navigate to the target sample locations using the coordinates identified on *Table 2: Field Sampling Plan* and handheld Global Positioning System (GPS) navigational equipment. Soil samples for non-VOC analysis will be collected from the top 6 inches using dedicated disposable high density polyethylene (HDPE) trowels, homogenized in dedicated, disposable aluminum trays, and placed into laboratory-prepared sample containers. EnCore® Samplers will be used to collect soil from the undisturbed soil below the non-VOC sample material for volatile organic analysis. Samples will be preserved as described on *Table 4: Sample Preservation*.

The following process will be utilized at each sample location to collect the soil samples for laboratory analysis:

- 1) Set up at the sampling location. A clean sheet of plastic sheeting will be placed over the area and secured
- 2) Ensure all necessary supplies are accessible (i.e., disposable aluminum pans, disposable sampling trowels, labeled sample containers, EnCore® samplers, garbage bags, logbook, weather-resistant pen, and required personal protective equipment (PPE) including but not limited to butyl and nitrile gloves, Tychem suits, safety glasses, hard hat, steel-toe boots, etc.).
- 3) Use dedicated, disposable sampling trowel to collect soil from 0- to 6-inch interval and place soil into dedicated, disposable aluminum tray
- 4) Screen soil for organic vapors using photoionization detector (PID).
- 5) Collect soil sample aliquot for VOC analysis from the soil at the bottom of the sample location (approximately 6 inches below grade) using EnCore® sampling device.
- 6) Homogenize soil sample for non-VOC analysis using trowel. Transfer homogenized soil from aluminum tray to laboratory-prepared sample containers.



- 7) Place filled sample containers into a cooler with wet ice and a temperature blank for shipment to the laboratory.
- 8) Containerize used sampling equipment and PPE for disposal.
- 9) Set up at next sampling location.

5.2 Surface Water Sampling

The sampling team will navigate to the target sample location using the coordinates identified on *Table 2* and handheld GPS navigational equipment. The surface water sample will be collected by immersion of the laboratory cleaned sample bottles into the pond. Water sample bottles will be pre-preserved as described on *Table 4*. The following process will be utilized to collect the surface water sample for laboratory analysis:

- 1) Ensure bottles are intact with a good fitting lid.
- 2) Collect samples for volatile organics analysis first to prevent loss of volatiles due to disturbance of the water. Use a laboratory clean, unpreserved, empty sample jar or a pond sampler to collect surface water and fill pre-preserved vials to zero headspace. Cap vial and invert to ensure no air remains in the vial.
- 3) For all bottles except samples for volatile organic analysis, proceed to immerse bottle by hand into surface water and allow water to run slowly into bottle until nearly full; do not fill to the point that preservative can wash out of the bottles.
- 4) Use care not to create sediment disturbance, especially when trace metals sampling is included in the requested analysis.
- 5) Samples will be placed into a cooler with wet ice and a temperature blank for shipment to the laboratory.
- 6) Containerize used PPE for disposal.

5.3 Sample Management

The sample bottles will be prepared for shipment accompanied by a chain of custody and the cooler containing them will be custody sealed. The chain of custody will also accompany the bottles during sample collection, transportation back to the laboratory, and analysis. Each form will be completed in the field and signed and dated by a member of the field team who will verify the exact sample shipment.

5.4 Quality Assurance and Quality Control

Quality assurance/quality control (QA/QC) samples will be collected in accordance with Weston's QAPP, included as part of the 2009 Consolidated RAWP (Addendum 3). Laboratory-blind field duplicate and matrix spike/matrix spike duplicate (MS/MSD) samples will be collected at a rate of 1 per 20 samples per analytical parameter. Field blanks will be collected once per day per matrix and analyzed for the same parameters as the field samples. A trip blank will accompany the surface water sample for VOC analysis.

Field activities, tests and observations will be recorded in a field logbook. Entries in the logbook will include the names of the individuals participating in the field effort, date and time, and the initials of the individual responsible for recording the observations.



6. Decontamination

Disposable sampling equipment will be used. However, should reusable sampling equipment be used, sampling equipment that comes in contact with contaminated material will be decontaminated prior to reuse and prior to removal from the site. Decontamination will be performed atop a pad or other device to capture all decontamination liquids; these liquids will be containerized for disposal as required in 40 CFR 761.79(g).

Wipe samples will be collected prior to release of decontaminated reusable sampling equipment from the site to document that decontamination is sufficient to meet the requirements of 40 CFR 761.79(b)(3)(i). Wipe testing will be performed in accordance with 40 CFR 761.243, with one wipe sample collected from each unique surface of the decontaminated equipment. One wipe sample will be collected per type of decontaminated equipment.

Once wipe sample results have confirmed decontamination has met the objectives of 40 CFR 761.79(b)(3)(i), the equipment may be released from the site for re-use. Should wipe samples fail to confirm sufficient decontamination, the above process will be repeated.

Reusable sampling equipment employed in areas with PCB concentrations less than 1 mg/kg will be decontaminated in the following sequence, prescribed in the *NJDEP Field Sampling Procedures Manual (August 2005), Section 2.4.1*:

- 1) Laboratory grade glassware detergent plus tap water wash
- 2) Generous tap water rinse
- 3) Distilled and deionized (ASTM Type II) water rinse
- 4) Acetone (pesticide grade) rinse
- 5) Total air dry
- 6) Distilled and deionized (ASTM Type II) water rinse

No confirmatory wipe sampling is required for decontamination of equipment used in areas with PCB concentrations less than 1 mg/kg.

7. Investigation-Derived Waste Management

Investigation-derived waste generated during sampling activities will be containerized and temporarily staged at the Hatco Site, in 55-gallon drums or other DOT-approved containers and handled in accordance with applicable Federal and State requirements.

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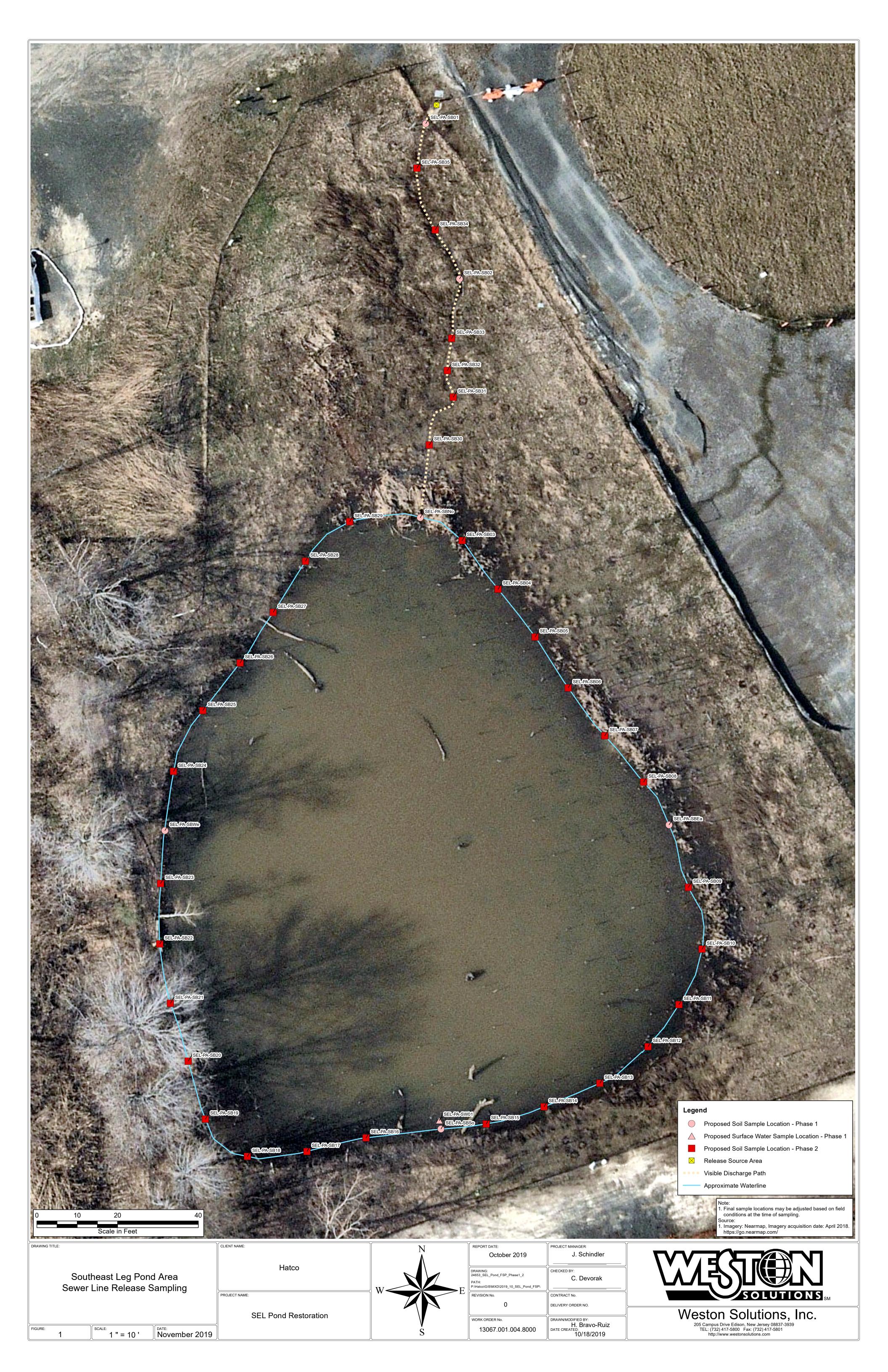
FIGURES

Figure 1: Southeast Leg Pond Area Sewer Line Release Sampling

TABLES

Table 1: Site-Specific Direct Contact Soil Remediation Criteria

Table 2: Field Sampling Plan Table 3: Sample Summary Table 4: Sample Preservation



	Remediation	0,000			
	CACDN	Sita Specific BDC	Nota	Sita Spacific NDDC	Note
Contaminant	CASRN	Site Specific RDC	Note	Site Specific NRDC	Note
Volatile Organic Compounds					
Acetone (2-propanone)	67-64-1	70000	_ \ /	NA	(6)
Acrolein	107-02-8	0.5	(5)	1	(5)
Acrylonitrile	107-13-1	1	(2)	5	(2)
Benzene	71-43-2	3	(2)	13	(2)
Bromodichloromethane (Dichlorobromomethane)	75-27-4	1	(1)	3	(1)
Bromoform	75-25-2	86	(2)	370	(2)
Bromomethane (Methyl bromide)	74-83-9	79	(2)	59	(1)
2-Butanone (Methyl ethyl ketone) (MEK)	78-93-3	3100	(4)	44000	(4)
Carbon disulfide	75-15-0	7800	(5)	110000	(5)
Carbon tetrachloride	56-23-5	2	(2)	4	(2)
Chlorobenzene	108-90-7	510	(4)	7400	(4)
Chloroethane (Ethyl chloride)	75-00-3	220	(5)	1100	(5)
Chloroform	67-66-3	0.6	(1)	2	(1)
Chloromethane (Methyl chloride)	74-87-3	4	(1)	12	(1)
1,2-Dibromo-3-chloropropane	96-12-8	0.08	(5)	0.2	(5)
Dibromochloromethane (Chlorodibromomethane)	124-48-1	3	(1)	8	(1)
1,2-Dibromoethane	106-93-4	0.008	(5)	0.04	(5)
1,3-Dichlorobenzene (m-Dichlorobenzene)	541-73-1	5300	(4)	59000	(4)
1,2-Dichlorobenzene (o-Dichlorobenzene)	95-50-1	5300	(4)	59000	(4)
1,4-Dichlorobenzene (p-Dichlorobenzene)	106-46-7	5	(1)	13	(1)
Dichlorodifluoromethane	75-71-8	490	(5)	230000	(5)
1,1-Dichloroethane	75-34-3	8	(1)	24	(1)
1,2-Dichloroethane	107-06-2	6	(2)	24	(2)
1,1-Dichloroethene	75-35-4	11	(4)	150	(2)
1,2-Dichloroethene (cis) (c-1,2-Dichloroethylene)	156-59-2	230	(4)	1000	(2)
1,2-Dichloroethene (trans) (t-1,2-Dichloroethylene)	156-60-5	1000	(2)	1000	(2)
1,2-Dichloropropane	78-87-5	10	(2)	43	(2)
1,3-Dichloropropene (cis and trans)	542-75-6	4	(2)	7	(4)
Ethyl benzene	100-41-4	7800	(4)	110000	(4)
Methyl acetate	79-20-9	78000	(5)	NA	(6)
Methyl tert-butyl ether (MTBE)	1634-04-4	110	(5)	320	_ ` ′
4-Methyl-2-pentanone (MIBK)	108-10-1	NA	(6)	NA S2S	(6)
Methylene chloride (Dichloromethane)	75-09-2	49	(2)	230	(4)
Styrene (Styrene)	100-42-5	90	(4)	260	(4)
Tertiary butyl alcohol (TBA)	75-65-0	1400	(5)	11000	(5)
1,1,1,2-Tetrachloroethane	630-20-6	1	(1)	1	(1)
1,1,2,2-Tetrachloroethane	79-34-5	1	(1)	3	(1)
Tetrachloroethene (PCE) (Tetrachloroethylene)	127-18-4	43	(4)	1500	(4)
Toluene	108-88-3	6300	(4)	91000	(4)
1,2,4-Trichlorobenzene	120-82-1	73	(4)	1200	(2)
1,1,1-Trichloroethane	71-55-6	NA	(3)	NA	(3)
1,1,2-Trichloroethane	79-00-5	2	(1)	6	(1)
Trichloroethene (Trichloroethylene) (TCE)	79-00-3	23	(2)	54	(2)
Trichlorofluoromethane	75-69-4	23000	(5)	340000	(5)
Vinyl chloride	75-09-4		_ ` ′	340000	
·		12000	(2)	170000	(2)
Xylenes (Total)	1330-20-7	12000	(4)	170000	(4)

	Remediation	,			
Contaminant	CASRN	Site Specific RDC	Note	Site Specific NRDC	Note
	CHSICIV	sitt specific rib e	1,000	Sitt Specific Fittes 6	1,000
Semi-Volatile Organic Compounds	92.22.0	2400	(2)	27000	(4)
Acceptation	83-32-9	3400	(2)	37000	
Acetalogical	208-96-8	NA 2	(6)	300000	(5)
Acetophenone	98-86-2	17000	(5)	20000	(5)
Anthracene	120-12-7	17000	(4)	30000	(4)
Atrazine	1912-24-9	210	(5)	2400	
Benzaldehyde	100-52-7	6100	(5)	68000	(5)
Benzidine	92-87-5	0.7	(5)	0.7	(5)
Benzo(a)anthracene (1,2-Benzanthracene)	56-55-3	5	(4)	17	(4)
Benzo(a)pyrene (BaP)	50-32-8	0.66	(2)	2	(4)
Benzo(b)fluoranthene (3,4-Benzofluoranthene)	205-99-2	5	(4)	17	(4)
Benzo(ghi)perylene	191-24-2	380000	(5)	30000	(5)
Benzo(k)fluoranthene	207-08-9	45	(4)	170	(4)
Benzyl Alcohol	100-51-6	NA	(6)	NA	(6)
1,1'-Biphenyl	92-52-4	61	(5)	240	(5)
Bis(2-chloroethyl)ether	111-44-4	0.66	(2)	3	(2)
Bis(2-chloroisopropyl)ether	108-60-1	23	(1)	67	(1)
Bis(2-ethylhexyl) phthalate	117-81-7	49	(2)	210	(2)
Butyl benzyl phthalate	85-68-7	1200	(4)	14000	(4)
Caprolactam	105-60-2	31000	(5)	340000	(5)
Carbazole	86-74-8	24	(5)	96	(5)
4-Chloro-3-methyl phenol (p-Chloro-m-cresol)	59-50-7	NA	(6)	NA	(6)
4-Chloroaniline (p-Chloroaniline)	106-47-8	NA	(6)	NA	(6)
2-Chlorophenol (o-Chlorophenol)	95-57-8	310		5200	(2)
Dibenz(a,h)anthracene	53-70-3	0.66		2	(4)
3,3'-Dichlorobenzidine	91-94-1	2	(2)	6	
2,4-Dichlorophenol	120-83-2	180	(4)	3100	(2)
Diethyl phthalate	84-66-2	49000	(4)	550000	(4)
2,4-Dimethyl phenol	105-67-9	1200	(4)	14000	(4)
Dimethyl phthalate	131-11-3	NA	(6)	NA	(6)
Di-n-butyl phthalate	84-74-2	6100	(4)	68000	(4)
4,6-Dinitro-2-methylphenol (4,6-Dinitro-o-cresol)	534-52-1	6	(5)	68	_ ` ′
2,4-Dinitrophenol	51-28-5	120	(4)	2100	(2)
2,6-Dinitrotoluene	606-20-2	0.7	(5)	3	
2,4-Dinitrotoluene	121-14-2	0.7	(5)	3	
2,4-Dinitrotoluene/2,6-Dinitrotoluene (mixture)	25321-14-6		(2)	4	
Di-n-octyl phthalate	117-84-0		_ ` ′	27000	()
7 1		2400	(4)		
1,2-Diphenylhydrazine	122-66-7	0.7	(5)	24000	
Fluoranthene	206-44-0	2300	_ ` _	24000	
Fluorene	86-73-7	2300	_ ` _	24000	` /
Hexachloro-1,3-butadiene	87-68-3	6	- (/	25	(4)
Hexachlorobenzene	118-74-1	0.66	_ ` /	2	
Hexachlorocyclopentadiene	77-47-4	400		110	_ ` /
Hexachloroethane	67-72-1	12	(4)	100	. /
Indeno(1,2,3-cd)pyrene	193-39-5	5	- (/	17	(4)
Isophorone	78-59-1	1100	_ ` _	10000	(2)
2-Methylnaphthalene	91-57-6	230		2400	. /
2-Methylphenol (o-creosol)	95-48-7	310	(1)	10000	(2)

	o Remediation	Појсск			
		a. a .a .a.		a: a .a .m.	
Contaminant		Site Specific RDC	Note	Site Specific NRDC	Note
4-Methylphenol (p-creosol)	106-44-5	31	(1)	340	(1)
Naphthalene	91-20-3	6	(1)	17	(1)
2-Nitroaniline	88-74-4	39	(5)	23000	(5)
Nitrobenzene	98-95-3	28	(2)	14	(1)
N-Nitrosodimethylamine	62-75-9	0.7	(5)	0.7	(5)
N-Nitrosodi-n-propylamine	621-64-7	0.66	(2)	0.66	(2)
N-Nitrosodiphenylamine	86-30-6	140	(2)	600	(2)
Pentachlorophenol	87-86-5	6	(2)	24	(2)
Phenanthrene	85-01-8	NA	(6)	300000	(5)
Phenol	108-95-2	18000	(4)	210000	(4)
Pyrene	129-00-0	1700	(2)	18000	(4)
2,4,5-Trichlorophenol	95-95-4	6100	(4)	68000	(4)
2,4,6-Trichlorophenol	88-06-2	62	(2)	270	(2)
Pesticides and PCBs					
Aldrin	309-00-2	0.04	(2)	0.2	(4)
Chlordane (alpha and gamma)	57-74-9	0.2	(5)	1	(5)
4,4'-DDD (p,p'-TDE)	72-54-8	3	(2)	13	(4)
4,4'-DDE (p,p'-DDX)	72-55-9	2	(2)	9	(2)
4,4'-DDT	50-29-3	2	(2)	9	(2)
Dieldrin	60-57-1	0.042	(2)	0.2	(4)
Endosulfan I and Endosulfan II (alpha and beta)	115-29-7	470	(4)	6800	(4)
Endosulfan sulfate	1031-07-8	470	(5)	6800	(5)
Endrin	72-20-8	23	(4)	340	(4)
alpha-HCH (alpha-BHC)	319-84-6	0.1	(5)	0.5	(5)
beta-HCH (beta-BHC)	319-85-7	0.4	(5)	2	(5)
Heptachlor	76-44-8	0.15	(2)	0.7	(4)
Heptachlor epoxide	1024-57-3	0.07	(5)	0.3	(5)
Lindane (gamma-HCH) (gamma-BHC)	58-89-9	0.52	(2)	2.2	(2)
Methoxychlor	72-43-5	390	(4)	5700	(4)
Polychlorinated biphenyls (PCBs)	1336-36-3	0.49	(2)	2	(2)
Toxaphene	8001-35-2	0.6	(4)	3	(4)
Inorganics	0001 33 2	0.0	(1)		(1)
Aluminum	7429-90-5	78000	(5)	NA	(6)
Antimony	7440-36-0	31	(4)	450	(4)
Arsenic	7440-38-2	20	(2)	20	
Barium	7440-39-3	16000	(4)	59000	(4)
Beryllium	7440-41-7	16	(4)	140	(4)
Cadmium	7440-43-9	78	(4)	100	(2)
Chromium – hexavalent (VI)	18540-29-9		(6)	NA 100	(6)
Chromium – trivalent (III)	16065-83-1		(6)	NA	(6)
Chrysene	218-01-9	450	(4)	1700	(4)
Cobalt	7440-48-4	1600	(5)	590	(5)
Copper	7440-50-8	3100	(4)	45000	(4)
Cyanide	57-12-5	47	(1)	680	(1)
Lead	7439-92-1	400	(2)	800	(4)
Manganese	7439-96-5	11000	(5)	5900	(5)
Mercury	7439-90-3	23	(4)	270	(2)
Nickel (Soluble salts)	7440-02-0	1600	(4)	23000	
ivickei (Soluble salts)	/440-02-0	1000	(4)	23000	(4)

Contaminant	CASRN	Site Specific RDC	Note	Site Specific NRDC	Note
Selenium	7782-49-2	390	(4)	5700	(4)
Silver	7440-22-4	390	(4)	5700	(4)
Thallium	7440-28-0	NA	(3)	NA	(6)
Vanadium	7440-62-2	370	(2)	7100	(2)
Zinc	7440-66-6	23000	(4)	110000	(4)

Notes:

All criteria in milligrams per kilogram dry weight basis

NA: Not applicable

CASRN: Chemical Abstracts Service Registry Number

NRDC: Non-Residential Direct Contact

RDC: Residential Direct Contact SCC: Soil Cleanup Criteria SRS: Soil Remediation Standard

(1): Change to SRS greater than one order of magnitude; SRS applies.

(2): Change to SRS less than one order of magnitude; SCC retained.

(3): Contaminant no longer regulated

(4): Less stringent SRS standard applied

(5): No applicable SCC, SRS applied

(6): Not a suspected site-related contaminant, no current SRS

L:\13067 Hatco\12.0 Preliminary Documents\2019-11 SEL Pond Restoration Planning\Field Sampling Plan\[2019-12-12 SEL Pond FSP Table 1-Soil Crite

Table 2. Field Sampling Plan Discharge to Restored Wetland Southeast Leg Remediation Area Hatco Remedation Project

ampling Phase	Target Northing	Target Easting	Location	Sample Depth (feet)	Sample ID	Delineation Goal
	614514	542588	SEL-PA-SB01	0.0 - 0.5	SEL-PA-SB01-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	614476	542597	SEL-PA-SB02	0.0 - 0.5	SEL-PA-SB02-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	542587	614417	SEL-PA-SBNo	0.0 - 0.5	SEL-PA-SBNo-A-B-0-MMDDYY	Surface soil
Phase 1	542648	614340	SEL-PA-SBEa	0.0 - 0.5	SEL-PA-SBEa-A-B-0-MMDDYY	Surface soil
	542592	614265	SEL-PA-SBSo	0.0 - 0.5	SEL-PA-SBSo-A-B-0-MMDDYY	Surface soil
	542524	614339	SEL-PA-SBWe	0.0 - 0.5	SEL-PA-SBWe-A-B-0-MMDDYY	Surface soil
	542592	614267	SEL-PA-SW01		SEL-PA-SW01-0-MMDDYY	Surface water sample
	542597	614411	SEL-PA-SB03	0.0 - 0.5	SEL-PA-SB03-A-B-0-MMDDYY	Surface soil
	542606	614399	SEL-PA-SB04	0.0 - 0.5	SEL-PA-SB04-A-B-0-MMDDYY	Surface soil
	542615	614387	SEL-PA-SB05	0.0 - 0.5	SEL-PA-SB05-A-B-0-MMDDYY	Surface soil
	542623	614374	SEL-PA-SB06	0.0 - 0.5	SEL-PA-SB06-A-B-0-MMDDYY	Surface soil
	542633	614362	SEL-PA-SB07	0.0 - 0.5	SEL-PA-SB07-A-B-0-MMDDYY	Surface soil
	542642	614351	SEL-PA-SB08	0.0 - 0.5	SEL-PA-SB08-A-B-0-MMDDYY	Surface soil
	542657	614310	SEL-PA-SB09	0.0 - 0.5	SEL-PA-SB09-A-B-0-MMDDYY	Surface soil
	542651	614296	SEL-PA-SB10	0.0 - 0.5	SEL-PA-SB10-A-B-0-MMDDYY	Surface soil
	542643	614285	SEL-PA-SB11	0.0 - 0.5	SEL-PA-SB11-A-B-0-MMDDYY	Surface soil
	542631	614276	SEL-PA-SB12	0.0 - 0.5	SEL-PA-SB12-A-B-0-MMDDYY	Surface soil
	542617	614271	SEL-PA-SB13	0.0 - 0.5	SEL-PA-SB13-A-B-0-MMDDYY	Surface soil
	542603	614266	SEL-PA-SB14	0.0 - 0.5	SEL-PA-SB14-A-B-0-MMDDYY	Surface soil
	542573	614263	SEL-PA-SB15	0.0 - 0.5	SEL-PA-SB15-A-B-0-MMDDYY	Surface soil
	542559	614259	SEL-PA-SB16	0.0 - 0.5	SEL-PA-SB16-A-B-0-MMDDYY	Surface soil
	542544	614258	SEL-PA-SB17	0.0 - 0.5	SEL-PA-SB17-A-B-0-MMDDYY	Surface soil
	542534	614267	SEL-PA-SB18	0.0 - 0.5	SEL-PA-SB18-A-B-0-MMDDYY	Surface soil
Phase 2	542529	614282	SEL-PA-SB19	0.0 - 0.5	SEL-PA-SB19-A-B-0-MMDDYY	Surface soil
	542525	614296	SEL-PA-SB20	0.0 - 0.5	SEL-PA-SB20-A-B-0-MMDDYY	Surface soil
	542522	614311	SEL-PA-SB21	0.0 - 0.5	SEL-PA-SB21-A-B-0-MMDDYY	Surface soil
	542522	614326	SEL-PA-SB22	0.0 - 0.5	SEL-PA-SB22-A-B-0-MMDDYY	Surface soil
	542533	614369	SEL-PA-SB23	0.0 - 0.5	SEL-PA-SB23-A-B-0-MMDDYY	Surface soil
	542542	614381	SEL-PA-SB24	0.0 - 0.5	SEL-PA-SB24-A-B-0-MMDDYY	Surface soil
	542550	614393	SEL-PA-SB25	0.0 - 0.5	SEL-PA-SB25-A-B-0-MMDDYY	Surface soil
	542558	614406	SEL-PA-SB26	0.0 - 0.5	SEL-PA-SB26-A-B-0-MMDDYY	Surface soil
	542569	614416	SEL-PA-SB27	0.0 - 0.5	SEL-PA-SB27-A-B-0-MMDDYY	Surface soil
	542526	614354	SEL-PA-SB28	0.0 - 0.5	SEL-PA-SB28-A-B-0-MMDDYY	Surface soil
	542653	614325	SEL-PA-SB29	0.0 - 0.5	SEL-PA-SB29-A-B-0-MMDDYY	Surface soil
	614435	542589	SEL-PA-SB30	0.0 - 0.5	SEL-PA-SB30-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	614446	542595	SEL-PA-SB31	0.0 - 0.5	SEL-PA-SB31-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	614453	542594	SEL-PA-SB32	0.0 - 0.5	SEL-PA-SB32-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	614461	542595	SEL-PA-SB33	0.0 - 0.5	SEL-PA-SB33-A-B-0-MMDDYY	Surface soil/Sewer release pathway
ŀ	614488	542591	SEL-PA-SB34	0.0 - 0.5	SEL-PA-SB34-A-B-0-MMDDYY	Surface soil/Sewer release pathway
	614503	542586	SEL-PA-SB35	0.0 - 0.5	SEL-PA-SB35-A-B-0-MMDDYY	Surface soil/Sewer release pathway

Notes:

Target Northing and Easting in New Jersey State Plane Coordinates

L:\13067 Hatco\12.0 Preliminary Documents\2019-11 SEL Pond Restoration Planning\Field Sampling Plan\[2019-12-12 SEL Pond FSP Table 2, 3, 4.xlsx\]Table 2 Samples

245.1 Mercary 1					No. of		No. of		No. of Laboratory- Blind	Frequency of	No. of		
335.4 Cyanide_Total 1	Matrix	Analytical Method	Parameter									Frequency of MS/MSD Samples	Comments
Analyze immer		245.1	Mercury	1	0	•	1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Surface Water Fish Fi	_	335.4	Cyanide, Total	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
B881B TCL Pesticides 1 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immer	_	335.4	Cyanide amenable	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Surface Water 8082A PCBs 1 0 0 1 1 per day 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immer Robert Rob	_	6020B	TAL Metals	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Surface Water Read PCBs 1	_	8081B	TCL Pesticides	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Surface Water		8151A	TCL Herbicides	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Record R	Dhaca 1 Curface Water	8082A	PCBs	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
8,270E TCL,SVOC + TICS 1	Priase i - Suriace Water -	8260D	TCL VOCs + TICs	1	1		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
218.6 / 7196 A / 7199 Hexavalent Chromium 1 0 1 1 1 1 1 1 1 1	_	8270E_SIM	SVOC - SIM Analytes	1	0	•	1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
B015B(M) EPH 1 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immet	_	8270E	TCL SVOC + TICs	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Field measurement	_	218.6 / 7196A / 7199	Hexavalent Chromium	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
8082A PCBs 6 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immed	_	8015B(M)	EPH	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
6010D TAL Metals 6 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immer	_	Field measurement	pН	1	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Record State Sta		8082A	PCBs	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Record R	_	6010D	TAL Metals	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Soil Registration Phase 2 - Soil Phase 2 - Soil Phase 1 samples Registration Registration Registration Phase 1 samples Registration Registration Registration Registration Phase 1 samples Registration Registration Registration Phase 1 samples Registration Registration Registration Phase 1 samples Registration Phase 1 samples Registration Post 1 cm Post 2 cm	_	8081B	TCL Pesticides	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 - Soil 8260D TCL VOCs + TICS 6 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immed	_	8151A	TCL Herbicides	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
8270E TCL SVOCs + TICs 6 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immed	_	7471B	Mercury	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 2 - Soil Phase 1 samples Phase 1 sam	Phase 1 - Soil	8260D	TCL VOCs + TICS	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
T199 3060A	_	8270E	TCL SVOCs + TICs	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
B015B(M) EPH 6 0 1 1 per day 1 1 per 20 analyzed 1 1 per batch of 20 samples Analyze immed	_	9012B	Cyanide	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Phase 1 samples Phase 1 sa	_	7199 / 3060A	Hexavalent Chromium	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
8082A PCBs 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples	_	8015B(M)	EPH	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
6010D TAL Metals 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples		9045D	pН	6	0		1	1 per day	1	1 per 20 analyzed	1	1 per batch of 20 samples	Analyze immediately
Rough Roug		8082A	PCBs	33	0		2	1 per day	2	1 per 20 analyzed	2	1 per batch of 20 samples	
Reference Refe	_	6010D	TAL Metals	33	0		2	1 per day	2	1 per 20 analyzed	2	1 per batch of 20 samples	
Reference Refe	_	8081B	TCL Pesticides	33	0		2		2		2		
(collect if exceedance(s) in Phase 1 samples)	_		TCL Herbicides		0		2						
(collect if exceedance(s) in Phase 1 samples) 8260D TCL VOCs + TICS 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples Analyses to be debugged Phase 1 samples) 8270E TCL SVOCs + TICS 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples by Phase 1 re 9010C Cyanide 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples 7199 / 3060A Hexavalent Chromium 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples	Phase 2 - Soil	7471B	Mercury	33	0		2	1 per day	2	1 per 20 analyzed	2	1 per batch of 20 samples	
Phase 1 samples) 8270E TCL SVOCs + TICs 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples 9010C Cyanide 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples 7199 / 3060A Hexavalent Chromium 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples	(collect if exceedance(s) in						2						,
9010C Cyanide 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples 7199 / 3060A Hexavalent Chromium 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples	· · · -												by Phase Tresults
7199 / 3060A Hexavalent Chromium 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples		9010C		33	0		2	1 per day	2		2		
	_												
	_				0		2		2	1 per 20 analyzed	2		
9045D pH 33 0 2 1 per day 2 1 per 20 analyzed 2 1 per batch of 20 samples	_		=: ::										

Notes:

A trip blank will accompany the surface water sample for VOC analysis.

(a) Total number of field blanks is dependent upon the duration of the sampling event.

°C Degrees Celsius

EPH Extractable petroleum hydrocarbons

g gram

mL milliliter

MS/MSD Matrix spike/matrix spike duplicate sample

oz ounce

PCBs Total Polychlorinated Biphenyls

SIM Selected-Ion Monitoring SVOCs Semi-Volatile Organic Compounds

TAL Target Analyte List

TCL Target Compound List

TICs Tentatively Identified Compounds
VOCs Volatile Organic Compounds

Matrix	Parameters	Sample Container*	Minimum Mass (g)	Analytical Method	Sample Preservation	Holding Time
	Mercury	250 mL HDPE	100	245.1	HNO ₃ to pH < 2	28 days
	Cyanide-total	1 L HPDE	500	SM4500-CN ⁻ C/E	Cool to 4°C ± 2°C, NaOH to pH > 12, 0.6g ascorbic acid	14 uays
	Cyanide amenable	1 L HPDE	500	SM4500-CN ⁻ G	Cool to 4°C ± 2°C, NaOH to pH > 12, 0.6g ascorbic acid	14 days
	TAL Metals	250 mL HDPE	100	6020B	Ultra HNO ₃ to pH < 2	180 days
	TCL Pesticides	1 L amber glass	1000	8081B	Cool to 4°C ± 2°C	7 days to extraction; 40 days from extraction to analysis
Surface Water	TCL Herbicides	1 L amber glass	1000	8151A	Cool to 4°C ± 2°C	7 days to extraction; 40 days from extraction to analysis
Guildoo Wator	PCBs	1 L amber glass	1000	8082A	Cool to 4°C ± 2°C	7 days to extraction; 40 days from extraction to analysis
	TCL VOCs + TICs	3 x 40 mL VOA vials	40	8260D	Cool to $4^{\circ}C \pm 2^{\circ}C$, HCl to pH < 2 (no headspace)	14 days
	SVOC - SIM Analytes	1 L amber glass	1000	8270E_SIM	Cool to 4°C ± 2°C	7 days to extraction; 40 days from extraction to analysis
	TCL SVOCs + TICs	1 L amber glass	1000	8270E	Cool to 4°C ± 2°C	7 days to extraction; 40 days from extraction to analysis
	Hexavalent Chromium	250 mL HDPE	200	218.6 / 7196A / 7199	Cool to 4°C ± 2°C	24 hours
	EPH	500 mL amber glass	500	8015B(M)	Cool to $4^{\circ}C \pm 2^{\circ}C$, H_2SO_4	14 days to extraction; 40 days from extraction to analysis
	pН	field measurement	50	field measurement	field measurement	15 minutes
	PCBs	4 oz glass w/Teflon lid	20	8082A	Cool to 4°C ± 2°C	14 days to extraction; 40 days from extraction to analysis
	TAL Metals	4 oz glass w/Teflon lid	2	6010D	None	180 days
	TCL Pesticides	4 oz glass w/Teflon lid	20	8081B	Cool to 4°C ± 2°C	14 days to extraction; 40 days from extraction to analysis
	TCL Herbicides	4 oz glass w/Teflon lid	50	8151A	Cool to 4°C ± 2°C	14 days to extraction; 40 days from extraction to analysis
	Mercury	4 oz glass w/Teflon lid	28	7471B	None	28 days
Soil	TCL VOCs + TICs	3 EnCore® Samplers	3/sample	8260D	Cool to 4°C ± 2°C	48 hours for extraction; 14 days for analysis
	TCL SVOCs + TICs	4 oz glass w/Teflon lid	20	8270E	Cool to 4°C ± 2°C	14 days to extraction; 40 days from extraction to analysis
	Cyanide	4 oz glass w/Teflon lid	10	9010C	Cool to 4°C ± 2°C	14 days
	Hexavalent Chromium	4 oz glass w/Teflon lid	10	7199 / 3060A	Cool to 4°C ± 2°C	30 days
	EPH	4 oz glass w/Teflon lid	10	8015B(M)	Cool to 4°C ± 2°C	14 days to extraction; 40 days from extraction to analysis
	pН	4 oz glass w/Teflon lid	20	9045D	Cool to 4°C ± 2°C	24 Hours

Notes:

* Coordinate with laboratory regarding use of discrete sample aliquots for multiple analyses.

°C Degrees Celsius

g EPH gram Extractable petroleum hydrocarbons

HDPE high density polyethylene

 HNO_3 Nitric acid H_2SO_4 Sulfuric acid L liter mL milliliter ounce 0Z NaOH Sodium hydroxide

Total Polychlorinated Biphenyls **PCBs** SIM Selected-Ion Monitoring SVOCs Semi-Volatile Organic Compounds

TAL Target Analyte List

TCL Target Compound List

TICs Tentatively Identified Compounds VOCs Volatile Organic Compounds

L:\13067 Hatco\12.0 Preliminary Documents\2019-11 SEL Pond Restoration Planning\Field Sampling Plan\[2019-12-12 SEL Pond FSP Table 2, 3, 4.xlsx]Table 4 Sample Preservation